

## DAI, LLC Plant # 21-015-00145, Permit # F-04-019

### Comment & Response

Below are the list of the received comments and their response(s):

1. **Source Comment:** Page 12, ID EQPT1 – The permitted sources are listed as one 1,000-gallon and two 300-gallon mixing tanks, which is what we indicated in the permit application. The two smaller tanks actually have a capacity of 350 gallons. We request that the Department make the appropriate change. Please note that this does not affect the batch size or emission rates reported in our application.

**DAQ Response:** Changed 300-gallon to 350-gallon.

2. **Source Comment:** Page 1, Condition No. L-3, and Page 13, Condition No. L-3 – These conditions establish a VOC emission limit of 20 tons per year. In our permit application, we requested a limit of 22.5 tons per year. We request that the permit limit be increased accordingly.

**DAQ Response:** Since DAI, LLC is located in a non-attainment area, the VOC limit of 20 tons per year will not be raised to 22.5 tons per year. DAI, LLC has submitted expected VOC emissions of 9.62 tons per year, therefore; a VOC emission of 20 tons per year is more than sufficient.

3. **Source Comment:** Page 4, Condition No. S-5 – This condition requires that DAI conduct a performance demonstration within 60 days after reaching maximum production, but no more than 180 days after startup. We would like more specific information about this test. Since the mixing tanks are not equipped with a stack, a stack test cannot be performed. Moreover, since the permit does not establish any hourly emission limits, we are not sure what the performance test results would be compared to. Finally, since the conditions on Page 1 state that compliance with the VOC and HAP emission limits is to be demonstrated by monthly emission calculations, we do not see the point of a stack test. Please indicate the Department's intent with respect to this condition

**DAQ Response:** Since there is no regulatory requirement to conduct one, the performance test has been removed from the permit.

These comments ask for minor changes and do not require another public notice.